

Phase II Permit Renewal Guiding Principles¹

Permit-Wide

- GP 1: Federal Regulations – The General Permit should remain consistent with the intent of the federal regulations and ensure that the Phase II program is technically and economically feasible for small municipalities to implement.
- GP 2: Continued Flexibility – Continue to use the General Permit to establish an overall framework for a Phase II municipal program with generic requirements; leaving the specific implementation actions to SWMPs. The General Permit should require the SWMPs to include/identify performance standards, timeframes, and responsible parties.
- GP 3: Additional Specificity – Although the flexibility of the current General Permit should be maintained, the renewed General Permit should add additional detail in order to clarify what is required and to provide statewide consistency.
- GP 4: Permit Structure – The outline/structure of the General Permit should be revised to provide more specificity for the stormwater management program elements.

Program-Specific

- Program Management – A new Minimum Control Measure should be developed for Program Management in order to assist in identifying the types of information/detail that should be included within the SWMP (coordination, legal authority, fiscal needs, etc.). (GP 3)
- Program Effectiveness Assessment - The General Permit should provide additional guidance for assessing program effectiveness within the annual reports and establish headline indicators in order to minimize the “bean counting” and optimize meaningful assessments. As a part of this, the General Permit could identify the minimum data needs necessary in order to report out on the headline measures. (GP 3)
- Special Requirements (or attachments)
 - Industrial/Commercial – There should not be a new Minimum Control Measure developed for industrial and/or commercial facilities. Instead, the incorporation of the requirements for these facilities should be provided within the context of the public education and outreach and the IDDE MCMs so that the General Permit is consistent with the intent of federal regulations. (GP 1)
 - Monitoring - Water quality monitoring programs as extensive as Phase I programs are cost-prohibitive for Phase II communities – chemical monitoring should not be required. (GP 2)

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- If the revised General Permit requires a monitoring element, it is important to ensure that monitoring and reporting support – rather than drive – the standard program elements (MCMs) and provide for prioritization of needs. In other words, monitoring and reporting should only be required and conducted to the extent that they help complete the adaptive management loop and answer critical management questions. Further, monitoring (chemical / physical / biological) should be limited to only those situations (e.g., impaired waterbodies) that are deemed by the Permittees and Regional Board to warrant special attention. (GP 2)
- Hydromodification / LID – Hydromodification management is in its infancy and many different approaches are being tried in California. Because of the complexity of this issue and the varying topographic and geologic conditions through out the State, any hydromodification requirements must be based on straight forward and easy to administer requirements. For instance the use of LID and treatment controls to satisfy hydromodification concerns. (GP 1, 2 and 3)

1 Example Permit Language – CASQA can provide example permit language as appropriate to support these guiding principles.